

EXHIBIT D

1 DOCKET NO. CPL-HHD-CV-15-6057664S (CLD X03)

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4 EDWARD McDEVITT, SUPERIOR COURT
5 v. J.D. OF HARTFORD
6 BOEHRINGER INGELHEIM AT HARTFORD
7 PHARMACEUTICALS, INC., and (Complex
8 BOEHRINGER INGELHEIM Litigation
9 INTERNATIONAL GMBH Docket)

10 *****

11 This Document Relates To:

12 All CT Pradaxa Actions

13 *****

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15 VIDEOTAPED DEPOSITION OF JOANNE VAN RYN
16 Monday, June 26, 2017
8:33 a.m.

17

Held at:
18 Covington & Burling, LLP
265 Strand
19 London, WC2R 1BH

20

REPORTED BY: CARRIE A. CAMPBELL, RDR CRR CSR

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1 for?

2 A. Yeah. Just to see if the idea
3 works at all.

4 Q. Okay. And then in the first
5 bullet point, you noted that in-house there
6 already existed four polyclonal rabbit
7 antibodies to dabigatran, correct?

8 A. That's what it says, yes.

9 Q. That's what you put in the
10 presentation, right?

11 A. Yes.

12 Q. Okay. And that those had been
13 developed in 2002 by Uli Kunz?

14 A. Yes, they were developed in the
15 early dabigatran testing in volunteers as a
16 way to measure dabigatran levels in the test
17 tube.

18 Q. And then the second bullet
19 point noted that all four of those antibodies
20 neutralize the anticoagulate effect of
21 dabigatran in human plasma, thrombin time
22 clotting assay, correct?

23 A. Yes.

24 Q. And that's what you were hoping
25 to do with the antidote that you were

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1 correct?

2 A. Yes.

3 Q. All right. And then if we look
4 to the following slide, you got proof of
5 concept in 2009, correct?

6 A. Yes.

7 Q. Okay. And we talked about that
8 already.

9 And then the next slide is
10 entitled "Is it possible to specifically
11 inhibit dabigatran," and the date you have on
12 here is January 2009, "making dabigatran
13 immunogenic," correct?

14 A. That's what it says, yes.

15 Q. And tell the jury what that
16 means.

17 A. Normally dabigatran doesn't --
18 you don't raise antibodies against
19 dabigatran, so you have to do something
20 chemically to make dabigatran different so
21 that it's possible to raise antibodies
22 against it.

23 And so here we started adding
24 its linker, it's called, to the actual
25 molecule of dabigatran, and then we added --

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1 you see this circle BSA, that stands for
2 bovine serum albumin. And it's a huge
3 protein. It's like a hundred times bigger
4 than this little tiny dabigatran. And this
5 is -- a bovine means it's from cows. And
6 when you inject this into mouse, they raise
7 antibodies because it's a foreign protein.
8 And so these antibodies -- that's how you
9 develop antibodies.

10 And then you purify hundreds of
11 them until you find the few antibodies that
12 also recognize the little dabigatran on the
13 end of this big protein. And that's how we
14 start -- that's how we found Praxbind,
15 through this process.

16 Q. Okay. And when you said you
17 purify hundreds of them, did you have to
18 purify hundreds of them, or were you already
19 pretty sure that you had the ideas for the
20 four that we've talked about?

21 How did that work?

22 MR. IMBROSCIO: Object to the
23 form.

24 THE WITNESS: No. The four
25 that we had had nothing to do with

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1 this. It only showed that the idea
2 would work.

3 We started completely over and
4 screened hundreds of these to find the
5 ones -- those four that we found were
6 very similar and could be humanized,
7 and one of them ended up becoming
8 Praxbind.

9 QUESTIONS BY MR. CHILDERS:

10 Q. Okay. So even though you
11 started all the way over, it still took you
12 less than a year to figure that out, right?

13 A. It took about a year in total,
14 I guess.

15 Q. When you say "a year in total,"
16 are you talking about from when you looked at
17 the antibodies you had already had in the
18 freezer to then or when you started
19 completely over?

20 A. So this is in January of 2009.

21 Q. Mm-hmm.

22 A. I don't remember exactly when
23 we did proof of concept. I think we did them
24 in parallel. So we wanted to see does the
25 idea work, and we started developing new

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1 **that quote so -- as you laughed about it?**

2 A. I don't know exactly.

3 Potentially.

4 **Q. And I assume you're laughing**
5 **because it was kind of ironic; it was already**
6 **in the freezer since 2002?**

7 A. And again, as we described
8 earlier, so that allowed me -- and that's
9 also what it says later -- to show that the
10 idea could work.

11 The actual antibodies, these
12 were polyclonal antibodies. They were dirty
13 antibodies. They were developed for a test
14 tube, never to be given to a person. It's
15 part of their standard work process.

16 They probably have antibodies
17 to every drug we've made in their freezer,
18 but this is -- he's not in research. I'm not
19 in pharmacokinetics. I had no idea that this
20 is a process that they do. And I only
21 learned about it because Norbert Huel had
22 mentioned that in our discussion.

23 **Q. And you had not asked him prior**
24 **to 2008 about that, correct?**

25 A. I didn't know about it.

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1 CERTIFICATE

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3 I, CARRIE A. CAMPBELL, Registered
4 Diplomate Reporter, Certified Realtime
Reporter and Certified Shorthand Reporter, do
5 hereby certify that prior to the commencement
of the examination, Joanne van Ryn was duly
6 sworn by me to testify to the truth, the
whole truth and nothing but the truth.

7 I DO FURTHER CERTIFY that the
8 foregoing is a verbatim transcript of the
testimony as taken stenographically by and
9 before me at the time, place and on the date
hereinbefore set forth, to the best of my
ability.

10 I DO FURTHER CERTIFY that I am
11 neither a relative nor employee nor attorney
nor counsel of any of the parties to this
12 action, and that I am neither a relative nor
employee of such attorney or counsel, and
13 that I am not financially interested in the
action.
14
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16

17 CARRIE A. CAMPBELL,
18 NCRA Registered Diplomate Reporter
Certified Realtime Reporter
19 California Certified Shorthand
Reporter #13921
Missouri Certified Court Reporter #859
20 Illinois Certified Shorthand Reporter
#084-004229
21 Texas Certified Shorthand Reporter #9328
Kansas Certified Court Reporter #1715
22 Notary Public

23 Dated: July 12, 2017
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ACKNOWLEDGMENT OF DEPONENT

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4

I, _____, do

5

hereby certify that I have read the

6

foregoing pages, and that the same is

7

a correct transcription of the answers

8

given by me to the questions therein

9

propounded, except for the corrections or

10

changes in form or substance, if any,

11

noted in the attached Errata Sheet.

12

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14

15

JOANNE VAN RYN

DATE

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Subscribed and sworn

to before me this

19

____ day of _____, 20____.

20

My commission expires: _____

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22

Notary Public

23

24

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